

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

**Civil Action No. 04-cv-10357-RCL
(Sorokin, U.S.M.J.)**

ECF Case

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), plaintiff makes the following initial disclosures.

A. The following individuals may have discoverable information.

1. Paul G. Roberts, The Interface Group, 300 First Avenue, Needham, Massachusetts 02494, (781) 707-2550. All matters relating to the agreement between defendant and IPI.

2. Sheldon G. Adelson, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, Nevada 89109, (702) 733-5500. All matters relating to each allegation of the complaint.

3. William Weidner, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, Nevada 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role in acquiring them.

Plaintiff reserves the right to amend this list.

B. Documents

1. Plaintiff's travel records.
2. Certain documents relating to applications for a gambling license in Macau.
3. Copies of newspaper articles and press releases concerning defendant's claims against plaintiff.

C. Computation of damages

Not applicable to this declaratory judgment action.

D. Insurance

Not applicable to this declaratory judgment action.

March 31, 2008
New York, New York

Respectfully submitted,

/s/ Andrew H. Schapiro
Andrew H. Schapiro
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Attorneys for Plaintiff
Sheldon G. Adelson

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 31, 2008.

/s/ Andrew H. Schapiro

Andrew H. Schapiro